

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

OLIVIA Y., *et al.*

PLAINTIFFS

v.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi, *et al.* DEFENDANTS

**AGREED MOTION FOR CONSENT ORDER EXTENDING TIME TO
FILE THE YEAR TWO IMPLEMENTATION PLAN**

Pursuant to paragraph I.B. of the Mississippi Settlement Agreement and Reform Plan ("Settlement Agreement"), which was approved by this Court on January 4, 2008, the parties were to have jointly developed a Year Two Implementation Plan by January 4, 2009. Because of a delay in implementing some of the core management reform mandates of the Settlement Agreement, the parties require additional time to develop the Year Two Implementation Plan. The parties respectfully request the entry of the enclosed Consent Order regarding the parties' agreements related to the date by which the Year Two Implementation Plan shall be finalized.

Respectfully submitted, this 30th day of December, 2008.

/s Shirim Nothenberg

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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I also certify that I have this day served a copy of the foregoing on the following non-ECF participants by United States Mail, postage prepaid:

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SO CERTIFIED, this the 30th day of December, 2008.

/s/Dewitt L. ("Rusty") Fortenberry, Jr.

